

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551-FDS

Hon. F. Dennis Saylor IV

**DECLARATION OF DANIEL MCGONAGLE
IN SUPPORT OF PLAINTIFF’S MOTION TO COMPEL**

I, Daniel McGonagle, hereby declare as follows:

1. I am an attorney with the law firm Prince Lobel Tye LLP, attorneys for plaintiff, Singular Computing LLC (“Singular”), in this action. I submit this declaration in support of Singular’s Motion to Compel.

2. Attached hereto as Exhibit A is a true and correct copy of excerpts from the Deposition Transcript of Nishant Patil.

3. Attached hereto as Exhibit B is a true and correct copy of an email from A. Porto to K. Gannon et al dated September 15, 2023.

4. Attached hereto as Exhibit C is a true and correct copy of an email from A. Porto to D. McGonagle et al dated October 5, 2023.

5. Mr. Mabey’s email address (mmabey@google.com) is identified as a “File Author” according to the metadata produced by Google on 4 documents.

6. Attached hereto as Exhibit D is a true and correct copy of GOOG-SING-00240398-00240422 which was marked as Exhibit 2 to Mr. Mabey’s deposition.

7. Attached hereto as Exhibit E is a true and correct copy of excerpts from the Deposition Transcript of Matthew Mabey.

8. Attached hereto as Exhibit F is a true and correct copy of GOOG-SING-00027477-00027478 which was marked as Exhibit 3 to Mr. Mabey's deposition.

9. Attached hereto as Exhibit G is a true and correct copy of an email from A. Bruns to Dan McGonagle et al dated July 25, 2022.

10. Attached hereto as Exhibit H is a true and correct copy of an email from A. Doherty to D. Shah dated December 4, 2023.

11. Attached hereto as Exhibit I is a true and correct copy of excerpts from the Expert Report of Philip Green.

12. Attached hereto as Exhibit J is a true and correct copy of excerpts from the Rebuttal Expert Report of Laura Stamm.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed at Boston, Massachusetts on December 7, 2023.

/s/ Daniel McGonagle